

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XYZ CORPORATION,

PLAINTIFF,

V.

THE PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE "A"

DEFENDANTS.

CIVIL ACTION No.: 1:20-cv-05058

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, XYZ Corporation ("Plaintiff"), by its undersigned counsel, hereby files this Motion requesting leave to file the following documents under seal: (1) Exhibit 1 to the Complaint; (2) Exhibit 2 to the Complaint; (3) the Amended Complaint which will identify and include additional allegations regarding Plaintiff and list the fully interactive, e-commerce stores operating under the seller aliases identified in Schedule "A" (collectively, the "Seller Aliases") and accompanying exhibits; (4) Schedule "A" attached to the Complaint and Amended Complaint, which includes a list of the Seller Aliases and the e-commerce store URLs under the Online Marketplaces and Domain Names; (5) Plaintiffs' Motion for Entry of a Temporary Restraining Order, including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery, and accompanying supporting memorandum, declarations, and exhibits, including screenshot printouts showing the e-commerce stores operating under the Seller Aliases; and, (6) Plaintiffs' Motion for Electronic Service of Process, and accompanying supporting memorandum, declaration, and exhibits.

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for: trademark infringement and counterfeiting; false designation of origin, passing off and unfair competition; violation of the Illinois Uniform Deceptive Trade Practices Act; and, copyright infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence as well as the hiding and/or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated: August 27, 2020

Respectfully submitted,

/s/ Ann Marie Sullivan

Ann Marie Sullivan

Alison Carter

AM Sullivan Law, LLC

1440 W. Taylor St., Suite 515

Chicago, Illinois 60607

Telephone: 224-258-9378

E-mail: ams@amsullivanlaw.com

ATTORNEYS FOR PLAINTIFF